



Packaged Frozen Foods Inc.

P.O. Box 545 • 7916 W. Bellevue Road • Atwater, CA 95301 • Phone (209) 358-5643

Date: August 12, 2005

Docket Number TM-0407

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave. S.W.
Room 4008-SO., Ag Stop 0268
Washington, DC 20250

Dole Packaged Frozen Foods desires the following compounds to remain on the **National List of Allowed Prohibited Substances, § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))."** Note, these compounds are currently on the list and should remain on the list since there is no suitable organic substitutes.

1. Enzymes (derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria)
2. Nitrogen (oil-free)
3. Oxygen (oil-free)
4. Citric acid
5. Ascorbic acid
6. Carbon dioxide
7. Chlorine materials (including chlorine, sodium hypochlorite, chlorine dioxide, etc.)
8. Ozone
9. Calcium hydroxide
10. Hydrogen peroxide
11. Phosphoric acid
12. Potassium hydroxide - prohibited for use in lye peeling of fruits and vegetables except when used for peeling peaches during the Individually Quick Frozen (IQF) production process.
13. Sodium hydroxide

DPFF currently uses ascorbic acid and citric acid to help the prevention of browning of the peaches during processing and Potassium Hydroxide is used for the peeling of peaches. Please find the attached the tap review on Potassium Hydroxide.

Regards,

Trudy A. Finn
Compliance Manager
Dole Packaged Frozen Food, Inc.
209-358-5643 x 217
209-358-6572 fax